

1 LINDBERGH PORTER, Bar No. 100091
2 ROBERT L. ZALETEL, Bar No. 96262
3 LITTLER MENDELSON, P.C.
4 333 Bush Street, 34th Floor
5 San Francisco, CA 94104
6 Telephone: (415) 433-1940
7 Facsimile: (415) 399-8490
8 Email: lporter@littler.com
rzaletel@littler.com

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10 Attorneys for Defendant
11 BROADSPECTRUM DOWNSTREAM SERVICES,
12 INC., formerly TIMEC COMPANY, INC.

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 KEVIN WOODRUFF, on behalf of himself
17 and classes of those similarly situated,

Plaintiffs,

18 vs.
19 BROADSPECTRUM DOWNSTREAM
20 SERVICES, INC., formerly TIMEC
21 COMPANY, INC., a corporation,

Defendant.

CASE NO. 3:14-CV-04105-EMC

**STIPULATION AND [PROPOSED]
PROTECTIVE ORDER ADDING
CHEVRON TO EXISTING PROTECTIVE
ORDER (ECF 31)**

22 Firmwide:140400529.5 052001.1047

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LITTLER MENDELSON, P.C.
333 Bush Street
34th Floor
San Francisco, CA 94104
415.433.1940

STIPULATION AND PROPOSED PROTECTIVE ORDER

This Agreement is entered into by and between the undersigned attorneys on behalf of their respective clients, Kevin Woodruff on behalf of himself and classes of those similarly situated (“Plaintiffs”) and Broadspectrum Downstream Services, Inc. formerly Timec Company, Inc. (“Defendant” or “Broadspectrum”). There is currently in place a Protective Order covering the production and copying of documents and testimony in depositions (ECF No. 31 filed February 13, 2015).

Plaintiff has requested that Broadspectrum produce copies of Chevron Refinery Manuals in Broadspectrum’s possession which Chevron considers confidential. Chevron has requested to be afforded the protections of the Protective Order currently in place with respect to the materials being produced by Broadspectrum, including that “the parties may first meet and confer prior to the filing of [Chevron] Confidential Material as to whether or not the Parties should request that the Confidential Material be filed under seal”, and prompt notification if the material is subpoenaed or subject to a document request in other litigation (ECF No. 31, p. 3, ll. 13-18, 23-28). The parties agree that any Chevron Confidential documents which Defendant produces in discovery will be treated as Confidential under the terms of the protective order currently in place (ECF No. 31). Furthermore, pursuant to the notification and meet and confer provisions of the Protective Order with regard to documents marked “Chevron Confidential”, Plaintiff and Defendant agree to communicate with Chevron counsel listed below, in addition to the other party in this case.

In the event any third parties serve a subpoena or document request in other litigation to a party holding Chevron Confidential material in this case, the parties subject to the subpoena or document request will promptly notify the other party that produced the Confidential material to allow that party to file objections or otherwise attempt to prevent disclosure of the Confidential material to the third party, and will not produce the Confidential material to the third party until legally required to do so. The party subject to the subpoena or document request will also promptly notify Chevron counsel below for the same purpose. Chevron will have all protections and responsibilities of the parties set forth in ECF No. 31.

Chevron counsel to be notified is Nicholas Gallo, Chevron Corporation, 6001 Bollinger Canyon Road, San Ramon, California 94583; telephone (510) 242-5580; facsimile (925)

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1 842-2501; Email: ngallo@chevron.com.

2 DATED: May 18, 2016

3 */s/ Robert L. Zaletel*

4 LINDBERGH PORTER
ROBERT L. ZALETEL
LITTLER MENDELSON, P.C.

5 Attorneys for Defendant
6 BROADSPECTRUM DOWNSTREAM
7 SERVICES, INC., formerly TIMEC
COMPANY, INC.

8 DATED: May 18, 2016

9 */s/ John T. Mullan*

10 JAY T. JAMBECK
LEIGH LAW GROUP

11 JOHN T. MULLAN
12 RUDY, EXELROD, ZIEFF & LOWE LLP

13 Attorneys for Plaintiffs
14 KEVIN WOODRUFF, on behalf of himself and
classes of those similarly situated

15 **[PROPOSED] ORDER**

16 For good cause appearing IT IS SO ORDERED.

17 DATED: May 18, 2016



18 DISTRICT COURT JUDGE